

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

UNITED STATES OF AMERICA)

v.)

No. 04-656-MAP

MICHAEL A. CROOKER)
Defendant.)

**GOVERNMENT'S MOTION TO SUBMIT EXHIBITS UNDER SEAL AND FOR BRIEF
IN CAMERA HEARING**

The United States of America, by Michael A. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves to submit Exhibits A-D which are attached hereto and will be relied upon by the government during the detention hearing scheduled for August 24, 2004 under seal. In support of its motion the government states that the public dissemination of the exhibits will compromise an ongoing investigation the nature of which is known to defense counsel and will be addressed by the government in camera.

WHEREFORE, the government respectfully requests that Exhibits A-D be filed under seal and that the Court allow the parties to meet with the Court for a brief in camera hearing prior to the detention hearing.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

Ariane D. Vuono
ARIANE D. VUONO

Assistant U.S. Attorney

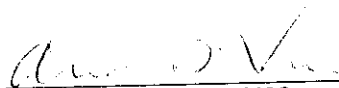
Agreed 2/12/04. Accused In camera hearing held the day with both counsel present. Exhibits to motion to be sealed at the joint request of the parties. to proceed. Michael A. Crooker

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 24, 2004

I, Ariane D. Vuono, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by hand to Attorney Vincent Bongiorno.



ARIANE D. VUONO
Assistant U.S. Attorney